

JACQUES G. BRONZE, ESQ.

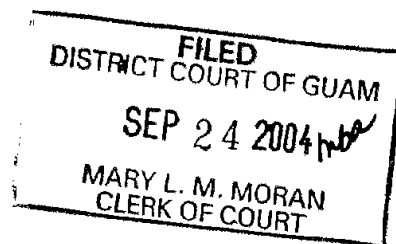
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Attorneys for Defendant Hongkong and Shanghai Banking Corporation, Ltd.

DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

APPLICATION FOR ADMISSION
PRO HAC VICE FOR PETER S.
MODLIN UNDER GUAM RULES
OF COURT AND DECLARATION
IN SUPPORT

Pursuant to General Rule of Court 17.1(d), the undersigned, who has been retained as co-counsel by Defendant The Hongkong and Shanghai Banking Corporation, Ltd. ("HSBC"),

ORIGINAL

respectfully makes application to this Court for admission *pro hac vice* for the purposes of appearing in the above captioned matter. In support thereof, applicant declares as follows:

1. My residence and office addresses are as follows:

Residence: 107 Brookside Drive, San Anselmo, California 94960

Office for Service of Process: Farella Braun + Martel LLP, 235 Montgomery Street, San Francisco, California 94104

Phone No.: (415) 954-4400

Fax No.: (415) 954-4480

2. Courts to which I have been admitted to practice and date of admission:
 - a. State Courts of California – December 1990
 - b. Northern District of California – 1993
 - c. Eastern District of California – 2000
 - d. Southern District of California – 1993
 - e. Ninth Circuit Court of Appeals – 1998

I am a member in good standing of, and am eligible to practice in, the above named courts. I am not currently suspended or disbarred in any court.

3. I have been retained by HSBC in the above-captioned matter to represent it in this matter.

4. I have obtained the agreement of Jacques G. Bronze, a member of the bar of this court, to serve as local counsel in this matter. His declaration signifying his written consent has been filed contemporaneously with this document. The court and opposing counsel may readily communicate with Mr. Bronze regarding the conduct of this action and may also serve papers

upon him as local counsel. Mr. Bronze has authority to act as attorney of record for all purposes.

His address is:


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5. I have never applied for admission *pro hac vice* to this Court.

6. I have personal knowledge of the matters stated herein and if called upon to testify thereto could competently do so.

7. I declare under the penalty of perjury under the law of the United States that the foregoing is true and correct.

Respectfully submitted this 16th day of September 2004.



PETER S. MODLIN
Co-Counsel for HSBC